

EXHIBIT 2

IN THE DISTRICT COURT IN AND FOR WAGONER COUNTY
STATE OF OKLAHOMA

WAGONER COUNTY, OKLAHOMA
FILED
IN DISTRICT COURT

NOV 19 2020

JAMES E. HIGHT
COURT CLERK

GREG Z. OWENS and
DELORES OWENS,

Plaintiffs,

v.

JEFF J. RINER, individually, and
BIG BOY TOWING & REPAIR,
LLC, an Arkansas Limited
Liability Company,

Defendants.

Case No. CS-20-268

**ATTORNEY'S LIEN CLAIMED
JURY TRIAL DEMANDED**

PETITION

COME NOW Plaintiffs, Greg Z. Owens, and for this their claim and cause of action against the Defendants, Jeff J. Riner, individually, (hereinafter Riner) and Big Boy Towing & Repair, LLC, (hereinafter Defendant Big Boy Towing) allege and state as follows:

I

That the facts which give rise to this cause of action occurred in Wagoner County.

That this Court has jurisdiction over the parties and the subject matter of this action.

II

That on or about the 2nd day of March, 2020, at or near South 205th East Avenue and East Fourth Street, in Catoosa, Wagoner County, Oklahoma,

Defendant Riner did negligently drive a vehicle owned by Defendant Big Boy Towing into Plaintiff Greg Owens while he was a pedestrian. That as a result of the negligence of Defendants, Plaintiff Greg Owens suffered severe, painful and permanent injuries to his person which have prevented him from transacting his business, and forced him to spend large sums of money to effect a cure to his injuries, which injuries are severe, painful and permanent in their nature.

III

That at the time of the negligence of Defendants and the resulting injuries to Plaintiff Greg Z. Owens, Plaintiff Gregory Owens was 69 years of age with a normal life expectancy of 10 years according to the United States Life Tables.

IV

The actions of Defendant Riner were willful, wanton, reckless and the Defendant should be punished, therefore, and made an example to others.

COUNT TWO

COME NOW Plaintiffs, Gregory Z. Owens, and adopts all allegations heretofore made by the Plaintiffs in Count One hereof as if fully set forth herein.

V

At all times pertinent to Plaintiffs' cause of action, Defendant Riner was acting within the course and scope of his employment with Defendant Big Bow Towing.

VI

That Defendant Big Boy Towing was negligent in the hiring, entrustment, and retention of Defendant Riner in his employment and being allowed to occupy a vehicle owned by Defendant Big Boy Towing.

COUNT THREE

COME NOW Plaintiffs, Anthony Pilkington and Tammy Pilkington, and adopts all allegations heretofore made by the Plaintiffs in Count One and Count Two hereof as if fully set forth herein.

VII

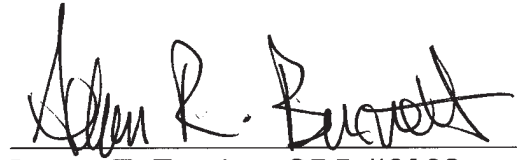
That at all times material herein, Plaintiff Delores Owens, was the lawfully wedded wife of the Plaintiff Gregory Z. Owens and as a result of the Defendant's negligence she suffered the losses of services, society, companionship, and consortium of her husband.

WHEREFORE, premises considered, Plaintiffs pray for judgement against the Defendants for actual damages in excess of Ten Thousand Dollars (\$10,000.00) for Plaintiff Gregory Z. Owen's personal injuries; for a sum in excess of Ten Thousand Dollars (\$10,000.00) for punitive damages; and in a sum in excess of Ten Thousand Dollars (\$10,000.00) for Plaintiff Delores Owens' loss of services, society, companionship, and consortium of her husband, together with interest thereon, all costs of this action and for such other relief to which they may be entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

By:

A handwritten signature in black ink, appearing to read "Adam R. Burnett", is written over a horizontal line.

James E. Frasier, OBA #3108

Frank W Frasier, OBA #17864

George Miles, OBA #11433

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